

EXHIBIT 125

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)



OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

DECLARATION

Pursuant to 28 U.S.C. 1746(2), I, Jesse White, hereby declare as follows:

1. I am the Secretary of State for the State of Illinois. I have served as Secretary of State since 1999; the longest-serving Secretary of State in the history of the State of Illinois.
2. As Secretary of State, I administer many departments that affect the lives of the citizens of the State of Illinois, including Driver Services and Vehicle Services, Business Services, the Illinois Securities Department, the Illinois State Library, the Illinois State Archives and the Secretary of State Police. Through these Departments, my Office deals more directly with the citizens of the State of Illinois than any other state agency.
3. The Deferred Action for Childhood Arrivals (DACA) program was instituted in 2012 to protect the immigrants who came to the United States of America as children from deportation, to allow them to work, to further their education, to move forward with their lives, and to continue to contribute to society in the United States. These immigrant children, many now grown up, are commonly known as "Dreamers."
4. It is estimated that there are 800,000 immigrants that have benefitted from DACA, including over 42,000 Dreamers in the State of Illinois. To qualify for DACA, the Dreamers have received background checks, attended colleges and universities, have work authorizations and serve in the United States Military. That last point is something I relate to strongly, having served three different times in military service, including with the 101st Airborne Division of the United States Army. Dreamers serving in the United States Military have my utmost admiration and respect.
5. The Dreamers are here through no fault of their own. As a group, they are displaying the values that we in the United States consider so important: getting an education, working hard, raising families, and contributing to their communities. The Dreamers have lived in this country for most of their lives. They consider themselves Americans. We are a nation of immigrants. A change in their immigration status, with the potential for deportation, goes against the values and principles of fairness and equality held dear by the American people and as espoused in the Constitution of the United States.

6. Operationally, the rescission of DACA will adversely affect the administration of the Office of the Secretary of State. Those 42,000 Dreamers in Illinois have state-issued identification cards and drivers licenses, having taken the appropriate steps to obtain a valid driver's license which include attending driving school, passing all the tests and obtaining vehicle insurance. They own motor vehicles which are registered, titled and licensed in the State of Illinois. They own businesses and property in this State. As a result, the Dreamers have paid and are paying title and licensing fees, business licensing fees and taxes, income tax, sales tax, use taxes and other taxes and fees. The Dreamers are positively contributing to the State of Illinois.
7. If DACA is rescinded, the operations of the Office of the Secretary of State will be adversely impacted. Along with the significant loss of revenue from all of the fees and taxes mentioned above, this Office will face undetermined costs and system disruptions related to the determination of eligibility for renewal of licenses and other benefits and services. In addition, this could potentially jeopardize road safety. Illinois will be required to amend administrative rules, regulations and laws to conform to the rescission of DACA.
8. Based on the foregoing, I am expressing my strong opposition to the federal government's ill-conceived plan to rescind the Deferred Action to Childhood Arrivals program. The Dreamers deserve the same opportunities of this great land as the many immigrants that came before them.

I declare under penalties of perjury under the laws of the United States of America and of the State of Illinois that the foregoing is true and correct. This Declaration is made on the 27th day of September, 2017 in the State of Illinois.

ILLINOIS SECRETARY OF STATE



JESSE WHITE